

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE SQUIRRELS RESEARCH LABS LLC, *ET*
AL.

Debtors

CASE No. 21-61491-TNAP
(JOINTLY ADMINISTERED)
CHAPTER 11
SUBCHAPTER V
JUDGE PATTON

FREDERIC P. SCHWIEG, TRUSTEE

Plaintiff

v.

SQUIRRELS LLC

Defendant

ADVERSARY No. 23-06033

ALL DOCUMENTS REGARDING THIS
MATTER MUST BE IDENTIFIED BY **BOTH**
ADVERSARY AND BANKRUPTCY CASE
NUMBERS AND NAME OF JUDGE

JOINT STIPULATIONS

Plaintiff and Defendant hereby stipulate to the following for the purposes of this
adversary proceeding only:

1. The court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. § 1334(b) and (d) and General Order 2012-07 of the United States District Court for the Northern District of Ohio.
2. This adversary proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B), (C), (K) and (O).
3. On November 23, 2021 (the "Petition Date"), Squirrels Research Labs LLC ("Debtor") filed its voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").
4. At issue in this matter are certain payments that the Trustee alleges that the Debtor made to the Defendant, as set forth in the attachment to the Complaint and attached hereto both as Exhibit A (the "Payments"). This stipulation is entered for all purposes in this matter, but one specific purpose is to allow the Court to rule on certain issues as a matter of

law. The parties anticipate that said ruling will simplify this matter for trial and may facilitate settlement of at least some claims.

5. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, business-related travel on behalf of the Debtor (“Travel Expense Reimbursements”).

6. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of supplies, materials, electronic components or other goods used to directly produce the Debtor’s products (“Material Expense Reimbursements”).

7. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of materials and services for construction or remodeling of the Debtor’s premises (“Remodeling Reimbursements”).

8. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent, or obligations that the Defendant incurred, for, or in connection with, the purchase of office supplies and/or office services (“Office Expense Reimbursements”).

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9. Certain of the Payments were made by the Debtor to reimburse the Defendant for money that the Defendant spent in making customer refunds (“Refund Expense Reimbursements”).

Respectfully Submitted,
/s/ Frederic P. Schwieg

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Subchapter V Trustee

Respectfully Submitted,
/s/ Jack Cooper, Esq.

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Counsel for Defendant

EXHIBIT A

Squirrels Research Labs LLC
Transactions: Squirrels LLC
 All Dates

1,662,239.59